



October 31, 2018

VIA ECF

Honorable Peggy Kuo
United States District Court
Eastern District of New York
225 Cadman Plaza East
Brooklyn, NY 11201

Re: *Ruane v. Bank of America, N.A., Chex Systems, Inc., and Early Warning Services, LLC*, 1:17-cv-03704-PKC-PK

Dear Judge Kuo:

The undersigned, along with Bromberg Law Office, P.C., represents Plaintiff in the above-referenced litigation. Please allow this letter to serve as a request, on consent of all parties, for a 90-day extension of fact discovery from November 9, 2018 to February 7, 2019, as well as a 90-day extension of the other pending discovery deadlines in this case. Pursuant to Your Honor's Individual Practice Rules a Proposed Discovery Plan containing the new proposed deadlines is attached. In addition, the date by which parties must serve the names, qualifications, and area of expertise of experts to be introduced in a party's case-in-chief would be extended from December 24, 2018 to March 24, 2019.

Counsel for defendants Bank of America, N.A. ("BANA"), Chex Systems, Inc., and Early Warning Services, LLC consent to this request. This is Plaintiff's first request to extend the deadline for fact discovery. This request is made due to the fact that discovery is ongoing, including but not limited to, discovery between BANA and Plaintiff, as discussed at the September 26, 2018 hearing.

Sincerely,
/s/ Eve Weissman
Eve Weissman, Esq.

CC: All counsel of record (via ECF)